

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Cabanillas & Associates, PC
Paola D. Vera, Esq.
120 Bloomingdale Rd., Suite 400
White Plains, NY 10605
914-385-0292

In Re:

Luz M. Villafane

Debtor(s).

Case No.: 18-23886

Objection deadline: 8/6/2020
Chapter: 13
Judge: Rosemary Gambardella

**DEBTORS' OBJECTION TO THE CERTIFICATION OF DEFAULT FROM
SECURED CREDITOR SPECIALIZED LOAN SERVICING**

The above named debtor, by and through his attorney of record, Paola D. Vera, Esq. of Cabanillas & Associates, P.C., hereby objects to the certification of the creditor and presents the Certification of Paola D. Vera and shows unto the court the following:

1. Debtor wishes to enter into a payment plan with secured creditor to cure the arrears.
2. Debtor agrees to pay \$1000.00 every other week until the arrears are paid in full.
3. In addition debtor will resume making monthly mortgage payments as of August, 2020.

/s/ Paola D. Vera
Paola D. Vera, Esq.

CABANILLAS & ASSOCIATES, PC
4100 Kennedy Blvd.
Union City, New Jersey 07087

8/6/2020